



EPA Region 5 Records Ctr.



200253

Solutia Inc.

575 Maryville Centre Drive
St. Louis, Missouri 63141

P.O. Box 66760

St. Louis, Missouri 63166-6760

Tel 314-674-1000

August 24, 2001

Janette Long
Savannah Laboratory
5102 LaRoche Ave
Savannah, GA 31404

Overnight Mail

Dear Ms. Long:

The United States EPA has asked us to have you make the attached changes to your laboratories Quality Assurance Manual and/or Standard Operating Procedures. The agency believes that the SOP issues can be resolved in a two-week time frame. Therefore, Sauget Area 2 Sites Group (SA2SG) is requesting that you make these changes requested by US EPA and return the modified Quality Assurance Manual and SOPs by September 7th, 2001. We also request that you list any of the U.S. EPA recommendations with which you do not agree, along with a brief explanation of why it is inappropriate.

The SA2SG is willing to pay your standard labor costs for this effort, if requested. We sincerely appreciate your prompt attention to this request. Please notify me by email if you have any questions, or will not be able to meet this deadline.

Sincerely;

A handwritten signature in black ink, appearing to read "Steven D. Smith".

Steven D. Smith
Project Coordinator
sdsmit@Solutia.com

cc: Mike McAteer - USEPA
SA2SG Members

LABORATORY QUALITY ASSURANCE MANUALS (QAM) AND SOPs VOLUME 5B
STL SAVANNAH

I VOLATILE COMPOUNDS BY GC/MS (8260B) VM20

- A The RLs and MDLs should be included with the SOP. The project required WATER PQLs for Benzene, cis-1,3-Dichloropropene, and Trichloroethene in QAPP TABLE 5C are lower than the RLs given in TABLE 5.1 (pg 67/180) of the STL QAM.
- B Appendix B
The project QC Requirements and Corrective Actions should be incorporated into this SOP. See QAPP Table 7A.

II SEMI-VOLATILE COMPOUNDS BY GC/MS (8270C) SM05

- A The RLs and MDLs should be included with the SOP. The project required WATER PQLs for several compounds in QAPP TABLE 5E are lower than the RLs given in TABLE 5.1 (pg 73/180) of the STL QAM. The project required SOIL PQLs for most compounds (170 ug/kg) in QAPP TABLE 5F are lower than the RLs (330 ug/kg) given in TABLE 5.2 (pg 116/180) of the STL QAM.
- B Section 9.0
Provide extraction procedures (SOPs) EX30, EX35, and EX40 that will be used.
- C Appendix A
The project QC Requirements and Corrective Actions should be incorporated into this SOP. See QAPP Table 7B.

III ORGANOCHLORINE PESTICIDES AND PCBs BY GC SG45

- A The RLs and MDLs should be included with the SOP. Only Pesticides will be analyzed by this method. The project required WATER PQL for Toxaphene is less than the RL given in TABLES 5.1 STL QAM. The project required SOIL PQLs for some compounds are less than the RLs given in TABLES 5.2 STL QAM.
- B Section 9.0
Provide extraction procedures (SOPs) EX30, EX35, and EX40 that will be used.
- C Appendix C
The project QC Requirements and Corrective Actions should be incorporated into this SOP. See QAPP Table 7C.

IV CHLORINATED HERBICIDES SG65

- A The RLs and MDLs should be included with the SOP. The project required SOIL PQL for Dalapon is less than the RL given in TABLES 5.2 STL QAM.

- B Section 9.0
Provide sample preparation procedure SL SOP EX45.
- C Pages 15 of 20 and 16 of 20
The project QC Requirements and Corrective Actions should be incorporated into this SOP. See QAPP Table 7C.

V Polychlorinated Biphenyls (PCBs) by GC/MS (Method 680) SM07

- A The RLs and MDLs should be included with the SOP.
- B Section 9.0
Provide extraction procedures (SOPs) EX30, EX35, and EX40 that will be used.
- C Pages 16 of 18 to 18 of 18
The project QC Requirements and Corrective Actions should be incorporated into this SOP. See QAPP Table 7D.

VI ELEMENTS BY ICP ME70

- A The RLs and MDLs should be included with the SOP.
- B Section 8.0, typo
Reference to Table 2, may be Table 1.
- C Section 8.7.1
Table 5 was not included.
- D Section 9.0
Provide digestion procedures ME50 and ME51.
- E Section 10.1.1.7.3, typo
The reference to Table 5, may be Table 1.
- F Section 12.0 and Page 27 of 29
The project QC Requirements and Corrective Actions should be incorporated into this SOP. See QAPP Table 7D.

VII PROVIDE SOPs

STL-Savannah must provide SOPs for the analysis of TCLP by EPA Method 1311, ORP, DO, Ferrous Iron, Nitrate, Sulfate, Alkalinity, Methane, Carbon Dioxide, pH in soil, and TOC in soil, if **STL-Savannah** is designated to do these analyses.